

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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KEENAN T. KNIGHT,

Plaintiff,

v.

Case No. 23-cv-886

AMIKA AVERY,  
JORDAN TAYLOR, and  
TERRELL WILLIAMS

Defendants.

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**DECLARATION OF JOHN DINGMAN**

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STATE OF WISCONSIN     )  
                                      ) SS  
MILWAUKEE COUNTY     )

I, John Dingman, declare pursuant to 28 U.S.C. § 1746, and under penalty of perjury that the following is true and correct:

1. I am an adult resident of the State of Wisconsin.
2. I was hired by the Milwaukee County Sheriff's Office (the "MCSO") as a corrections officer on February 13, 2017, and assigned to work at the Milwaukee County Jail (the "Jail"). Currently, I am employed by the MCSO as a Corrections Lieutenant.
3. I base this declaration on my personal knowledge of the facts attested to herein and my review of the relevant records of Milwaukee County, which records are kept in the ordinary course of business.
4. Keenan Knight was in the custody of the MCSO from December 5, 2021 until October 13, 2023. Attached hereto as **Exhibit 1** is a true and correct copy of Mr. Knight's housing

history in the Jail.

5. I have reviewed Mr. Knight's Complaint that was filed in the above-captioned matter. As a result, I am aware that his allegations pertaining to May 31, 2023.

6. Attached hereto as **Exhibit 2** please find a true and correct copy of Incident Report No. 23-105220 dated May 31, 2023, which includes the Incident Report and six supplemental reports.

7. By Milwaukee County policy, video depicting use of force incidents is required to be downloaded and reviewed by Jail administration members and MCSO members who review use of force incidents to ensure the amount of force used was objectively reasonable under the circumstances.

8. Attached hereto as **Exhibit 3** is a true and correct copy of the body camera video that was downloaded and preserved from the May 31, 2023 incident involving Mr. Knight.

9. Attached hereto as **Exhibit 4** is a true and correct copy of the video from the 6th Floor – Floor Control area the Jail that was downloaded and preserved from the May 31, 2023 incident involving Mr. Knight.

10. Attached hereto as **Exhibit 5** is a true and correct copy of the major disciplinary incidents caused by Mr. Knight during his incarceration. As evidenced by Exhibit 5, Mr. Knight caused nine different disturbances throughout the Jail that warranted being placed on discipline for violating Jail rules. The major disciplinary violations are those that are defined by Wis. Admin. Code § DOC 350.24(3)(a).

11. Attached hereto as **Exhibit 6** is a true and correct copy of Mr. Knight's classification file during the relevant incarceration period.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.  
Executed on July 31, 2024.

s/ John Dingman  
JOHN DINGMAN